

EXHIBIT 8

**EXHIBIT TO
JOINT PRETRIAL ORDER**

		surrounding and important issues in that election. Perez will testify that partisan politics, not race, informs the outcome of SBISD elections, that SBISD has sound, non-discriminatory reasons for using the at-large election system, and that SBISD's election system does not violate the Voting Rights Act. He will testify that SBISD is responsive to the needs of the minority group, and that SBISD elections are not characterized by overt or subtle racial appeals..
Courtney Anderson	c/o the Undersigned Counsel	Courtney Anderson is a recently elected Trustee on the SBISD Board. Prior to running for the Board she was involved in SBISD elections and was a voter. She is expected to testify that she became active and involved as an SBISD parent, including through a group called the PIPELine, which supports candidates for school board and was formed to promote in-person education during the Pandemic. Courtney Anderson is expected to testify about the issues that were important in her election against David Lopez, including issues of partisan politics which predominated. Anderson will testify that partisan politics, not race, informs the outcome of SBISD elections, that SBISD has sound, non-discriminatory reasons for using the at-large election system, and that SBISD's election system does not violate the Voting Rights Act. She will testify that SBISD is responsive to the needs of the minority group, and that SBISD elections are not characterized by overt or subtle racial appeals.
John Alford	c/o the Undersigned Counsel	John Alford is an expert witness retained by Defendants in this case. Dr. Alford is a tenured professor of Political Science at Rice University in Houston, Texas. He earned his Ph.D. in Political Science from the University of Iowa, and his CV has been produced to Plaintiff. Dr. Alford's opinions are set forth in his expert reports. Dr. Alford is expected to rebut the testimony of Plaintiff's expert, Dr. Stein, that the Gingles Factors and Senate Factors demonstrate that Defendants' election system violates the Voting Rights Act. Dr. Alford will testify that low Hispanic voter turnout has impacted SBISD elections and serves as one explanation to rebut Dr. Stein's contentions.
Christina Deboben	11006 Hunters Park Dr., Houston, TX 77024	Christina Deboben is a resident of SBISD and an SBISD voter. She is expected to testify about her concerns with SBISD's policies that led her to vote in the SBISD Trustee elections. She is expected to testify that she is of

		Cuban heritage, is a native Spanish speaker, and was a supporter of Chris Earnest.
Gaby Salo	231 Faust Ln., Houston, TX 77024	Gaby Salo is an SBISD parent and voter. She is expected to testify that she is of Mexican Heritage, is a native Spanish speaker, and was a supporter of Chris Earnest for the reasons set forth in the op-ed she authored (which has been disclosed to Plaintiff).
Rolando Garcia	Address Unknown 512-447-9821	Mr. Garcia is the Senate District 15 Chairperson for the State Republican Executive Committee. He is expected to testify that he is of Hispanic heritage, that he is a supporter of conservative candidates for SBISD Board of Trustees (including Earnest), that the Texas GOP has made efforts to support conservative candidates for school board across the state (including SBISD), and that partisan politics play a large role in SBISD elections.
Christine Porter	c/o the Undersigned Counsel	Christine Porter is the Associate Superintendent for Finance. She is expected to testify about SBISD's history as a District, history of elections, and its current elections practices. Porter may also testify about the allocation of District resources and past Bond measures, and that SBISD equitably allocates resources and programs.
Kristin Craft	c/o the Undersigned Counsel	Kristin Craft is the SBISD Associate Superintendent for Academics. She is expected to testify about the District's academic programs, including testimony about how SBISD is responsive to community needs by striving to meet the needs of Hispanic students in SBISD.
Virginia Elizondo	c/o Plaintiff's Counsel	Virginia Elizondo is the Plaintiff. She is expected to testify about all matters pertaining to her claims set forth in Plaintiff's complaint. She is also expected to testify about the two elections in which she sought a position as SBISD Trustee, and the important issues in each of those elections (including important partisan political issues).
Noel Lezama	Katy Freeway, Suite 244, Houston, TX 77024	Noel Lezama was an unsuccessful candidate for Trustee of the SBISD School Board. He is expected to testify about his campaigns, and the issues important in those elections (including important partisan political issues). Lezama is also expected to testify that he has since supported the candidacies of other unsuccessful candidates, and that partisan politics played a critical role in those elections. Lezama will testify about the documents produced in this case pertaining to SBISD trustee elections.

David Lopez	9521 Kerrwood Ln., Houston Texas, 77080	David Lopez was twice an unsuccessful candidate for Trustee of the SBISD School Board. He is expected to testify about his campaigns, and the issues important in those elections (including important partisan political issues). Lopez is also expected to testify that he has since supported the candidacies of other unsuccessful candidates, and that partisan politics played a critical role in those elections. Lopez will testify about the documents produced in this case pertaining to SBISD trustee elections.
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NOTICE:

In the event there are any other witnesses to be called at the trial, their names, addresses, and the subject matter of their testimony shall be reported to opposing counsel as soon as they are known. This restriction shall not apply to rebuttal or impeaching witnesses, the necessity of whose testimony cannot reasonably be anticipated before the time of trial.

Respectfully submitted,

**ABERNATHY, ROEDER, BOYD
& HULLETT, P.C.**

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ATTORNEYS FOR DEFENDANTS

Certificate of Service

I certify that the foregoing Witness List was served on all parties of record as an attachment to the Joint Final Pretrial Order on October 6, 2023.

/s/Lucas C. Henry
Lucas C. Henry

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VIRGINIA ELIZONDO

Plaintiff,

V.

**SPRING BRANCH ISD, COURTNEY
ANDERSON, JOHN PEREZ,
CAROLINE BENNETT, SHANNON
MAHAN, MINDA CAESAR, CHRIS
EARNEST, LISA ALPE, in their official
Capacities as members of the Board of
Trustees of Spring Branch ISD
*Defendants.***

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Civ. Action No. 4:21-CV-01997

DEFENDANTS' TRIAL WITNESS LIST

Defendants, the Spring Branch ISD and its Board of Trustees in their Official Capacities, intend to call the following witnesses at trial on this matter:

Witness	Address	Expected Testimony
Chris Earnest	c/o the Undersigned Counsel	Chris Earnest is the President of the SBISD School Board. He is a Defendant in this case. Earnest is expected to testify about the election in which he defeated Plaintiff, including the circumstances surrounding and important issues in that election. Earnest will testify that partisan politics, not race, informs the outcome of SBISD elections, that SBISD has sound, non-discriminatory reasons for using the at-large election system, and that SBISD's election system does not violate the Voting Rights Act. He will testify that SBISD is responsive to the needs of the minority group, and that SBISD elections are not characterized by overt or subtle racial appeals.
John Perez	c/o the Undersigned Counsel	John Perez is a Trustee on the SBISD School Board and is Hispanic. He is a Defendant in this case. Perez is expected to testify about the election in which he was elected to the Board, including the circumstances

		surrounding and important issues in that election. Perez will testify that partisan politics, not race, informs the outcome of SBISD elections, that SBISD has sound, non-discriminatory reasons for using the at-large election system, and that SBISD's election system does not violate the Voting Rights Act. He will testify that SBISD is responsive to the needs of the minority group, and that SBISD elections are not characterized by overt or subtle racial appeals..
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Respectfully submitted,

**ABERNATHY, ROEDER, BOYD
& HULLETT, P.C.**

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ATTORNEYS FOR DEFENDANTS

Certificate of Service

I certify that the foregoing Witness List was served on all parties of record as an attachment to the Joint Final Pretrial Order on October 6, 2023.

/s/Lucas C. Henry
Lucas C. Henry